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ROCKY FLATS PLANT
ENVIRONMENTAL MANAGEMENT DEPARTMENT

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PROCEDURE

RECORDS IDENTIFICATION, GENERATION AND TRANSMITTAL

RM-06.02

Revision 0

Date Effective: 05/28/97

APPROVED:

[Signature]
Sr. Vice President, Administration

5/28/97
Date

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1.0 PURPOSE

This procedure provides direction for the identification and generation of RMRS records, regardless of media type, and preparation of those records for transmittal to the RMRS Central Records Facility (RMRS CRF).

This procedure implements 10 CFR 830.120, *Quality Assurance Requirements*; DOE Order 5700.6C, *Quality Assurance*; 1-V41-RM-001, *Records Management Guidance for Records Sources*; and RMRS-QAPD-001, *Quality Assurance Program Description*.

2.0 SCOPE

This procedure applies to RMRS personnel and subcontractors involved in the identification and preparation of Quality Assurance (QA), non-QA, and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Administrative Records (AR), including field records, and transmittal of those records to the RMRS CRF. These activities include:

Identification of Records

- Distinguishing between a record and a non-record
- Distinguishing between a QA and a non-QA record

Generating a New Record for Capture Into the RMRS CRF

- Authenticating a record
- Choosing the correct document type and process (AR, controlled document, etc.)
- Making corrections to records before submittal
- Documenting electronic records for processing

Transmittal of Records to the RMRS CRF

- Adding supporting material
- Documenting lost or damaged records
- One-of-a-kind or special processed records
- Releasing the final record
- Making corrections to previously submitted records

This procedure does not apply to: preliminary draft documents (which do not require capture into the RMRS CRF); classified documents; records generated under Rocky Flats Environmental Technology Site (RFETS) requirements manuals or documents, such as the Conduct of Engineering Manual; or records generated by RMRS and identified in RMRS Contract KH00003HSIA, Section H.4(b) "Subcontractor's Own Records."

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

A-SW-002394

This procedure replaces RMRS procedures 2-G18-ER-ADM-17.01, Records Capture and Transmittal, and 2-N96-ER-ADM-17.09, Records Identification, Preliminary Preparation, and Creation.

3.0 DEFINITIONS

Administrative Record (AR). The completed compilation of records which establishes the basis for all removal and remedial action decisions for each Individual Hazardous Substance Site (IHSS), Operable Unit (OU), or decontamination & decommissioning (D&D) activity at the Site, as required by section 113(k)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Authentication. The act of attesting that the information contained within a record is accurate, complete, and appropriate for the work accomplished. A document still in process cannot be authenticated until it is completed. Authentication of both QA and non-QA records is required at Rocky Flats Environmental Technology Site (RFETS or Site).

Central Records Facility. The centralized location within RMRS where records are collected, processed, maintained, and retrieved until no longer needed for current business.

Disposition. Transfer of records no longer needed for current government business including: transfer to agency storage facilities or Federal Records Centers; transfer from one federal agency to another (with the approval of the Archivist of the United States); transfer of permanent records to the National Archives; or disposal of temporary records.

Document. Any writings, drawings, graphs, charts, photographs, and compilations of data from which information can be obtained or decisions made. A document becomes a record when it is complete and authenticated.

Dual Storage. Two copies of quality assurance records stored in areas that are sufficiently remote from each other so they cannot be destroyed by the same disaster.

Electronic Record. Records stored in a form that only a computer can process.

QA Record. Originals or reproduced copies of completed documents that furnish evidence of the quality of items and activities that affect, prescribe, generate, result in, or impact national security or the health and safety of RFETS personnel, the public, or the environment. QA records are of value in helping to demonstrate or attest to the degree or extent to which items, components, systems, structures, processes, or activities conform to requirements mandated by the RFETS QA program. QA records are considered complete and valid when authenticated, indicating final review and approval by authorized personnel; otherwise, they are considered in process.

Record. All books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or activities of the government or because of the informational value of data in them. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of processed documents are not included. That is, **records are documents that provide substantive information about, or evidence of, the organization, functions, policies, decisions, procedures, operations, or other activities of the government.**

Records Package. A collection of records supporting one topic (subject) that is filed as a case file, such as a Quality Assurance (QA) audit file, or a contract or procurement file.

Records Source. Any individual working for RMRS or an RMRS subcontractor who creates or receives Rocky Flats records from internal or external sources, including any individual who creates or receives a record from internal or external sources that was generated as part of government or government sponsored activities related to the Rocky Flats Cleanup Agreement (RFCA). An individual may be designated the Records Source for an organization.

Special Process Records. Records that require special handling and must be maintained in a particular way, or that cannot be duplicated or microfilmed.

4.0 RESPONSIBILITIES

4.1 RMRS Managers

- Identify the records to be generated or received as a result of RMRS activities; ensure that the records are identifiable to the items or activities to which they apply; that the records are appropriately designated QA, non-QA, and/or AR; and are transmitted to the RMRS CRF according to these instructions.
- Authorize individuals within their area of responsibility to authenticate quality records.
- Ensure that records (including those of subcontractors) are protected from deterioration, loss, larceny, or damage prior to turnover to the RMRS CRF.
- Ensure personnel are aware of and understand the requirements of this procedure.
- Ensure that personnel within their organization have transmitted all records to the RMRS CRF prior to transfer or termination of employment.

4.2 RMRS Record Sources

- Ensure that records prepared are legible, accurate, and completed appropriate to the work accomplished; are authenticated by authorized personnel; are reviewed for classification by an Authorized Derivative Classifier; and are corrected as necessary.
- Ensure that records documenting RMRS activities are transmitted to the RMRS CRF within 30 working days from the date of completion or receipt by their organization.

Note: Quality assurance records may be stored temporarily at or near a project in one-hour fire rated cabinets, if approved by the Quality Assurance Manager or the RMRS Records Technical Lead. However, a copy of each record is transmitted to the RMRS CRF for scanning into the MicroDynamics Archival and Retrieval System (MARS) and indexing in the RMRS central database of records to ensure dual storage, and a comprehensive listing of RMRS' generated records.

- Ensure that correspondence and other communications are submitted to the RMRS CRF by including the CRF on the courtesy copy (cc) list (buck slip), and include any attachments and enclosures. Groups of records or records packages transmitted to the RMRS CRF are accompanied by a Records Transmittal Form (Appendix 1).

Note: All records may be transmitted to the RMRS CRF using a records transmittal form when a receipt is desired or necessary.

4.3 RMRS Central Records Facility Personnel

Ensure that RMRS records received for processing, protection, and maintenance meet the records acceptance criteria and are processed in accordance with procedure RM 06.03, *Records Receipt, Processing, and Retrieval*.

4.4 RMRS Document Control Center Personnel

Assign RMRS document identification numbers and prepare appropriate RMRS document covers.

5.0 INSTRUCTIONS

The National Archives and Records Administration (NARA) is the government organization that establishes policies and procedures for managing the records of the federal government. DOE Order 1324.5B, Records Management Program, implements NARA guidelines and states that complete and accurate records of the conduct of federal government business are required to document the organization, functions, policies, decisions, procedures, and essential transactions of the agency (RFETS). Adequate and proper documentation furnishes the information necessary to protect the legal and financial rights of the government and of persons directly affected by government activities.

The flow chart in Figure 1 outlines the basic steps of these instructions in compliance with NARA guidelines.

5.1 Identification of Records

Records to be generated as a result of RMRS activities are identified in the records section of appropriate procedures and instructions. (See Section 6.0 of this procedure for the correct RMRS format.)

Note: Retention periods are determined jointly by the appropriate Program Manager and the RMRS Records organization based on specific program requirements, Department of Energy approved records schedules, or the General Records Schedule, as appropriate.

- (1) Determine whether a document or item meets the definition of a record (Section 3). Examples of records generated as a result of RMRS activities include, but are not limited to contracts, forms, procedures, reports, Requests for Proposals and contracts, work plans, and correspondence. A *Yes* answer to one or more of the following questions identifies the document as a record.
 - Does it provide evidence of work by a department or its personnel?
 - Will it become part of a subject or project file?
 - Does it require that an action be taken?
 - Is it a document you have received, and to which you have added information that would affect the meaning or content?
 - Does it change the way you conduct government business?

Note: If a document is a preliminary draft, or an information-only type of document, and does not fit the definition of a record as described above, it is a non-record and not subject to these instructions. Clearly mark such documents as *Preliminary Draft* or *Information Only*. Non-records provide no evidence of program functions or activities, lack informational value, and/or duplicate information already documented in records, and are therefore not unique. A detailed list of examples of non-records is contained in Appendix 2 of 1-V41-RM-001, *Records Management Guidance for Records Sources*. Non-record material is filed separately from record material and is destroyed when no longer needed.

- (2) Determine whether the record is potentially a CERCLA Administrative Record (AR). AR documents are identified and submitted according to 2-S65-ER-ADM-17.02, *Administrative Record Document Identification and Transmittal*.
- (3) Distinguish between QA and non-QA records. A document is considered a QA record if it:
 - Furnishes evidence of the quality of items or activities that affect quality or safety and has been executed, completed, and approved (e.g., chain-of-custody form, data validation, logbooks).

Figure 1
FLOW CHART

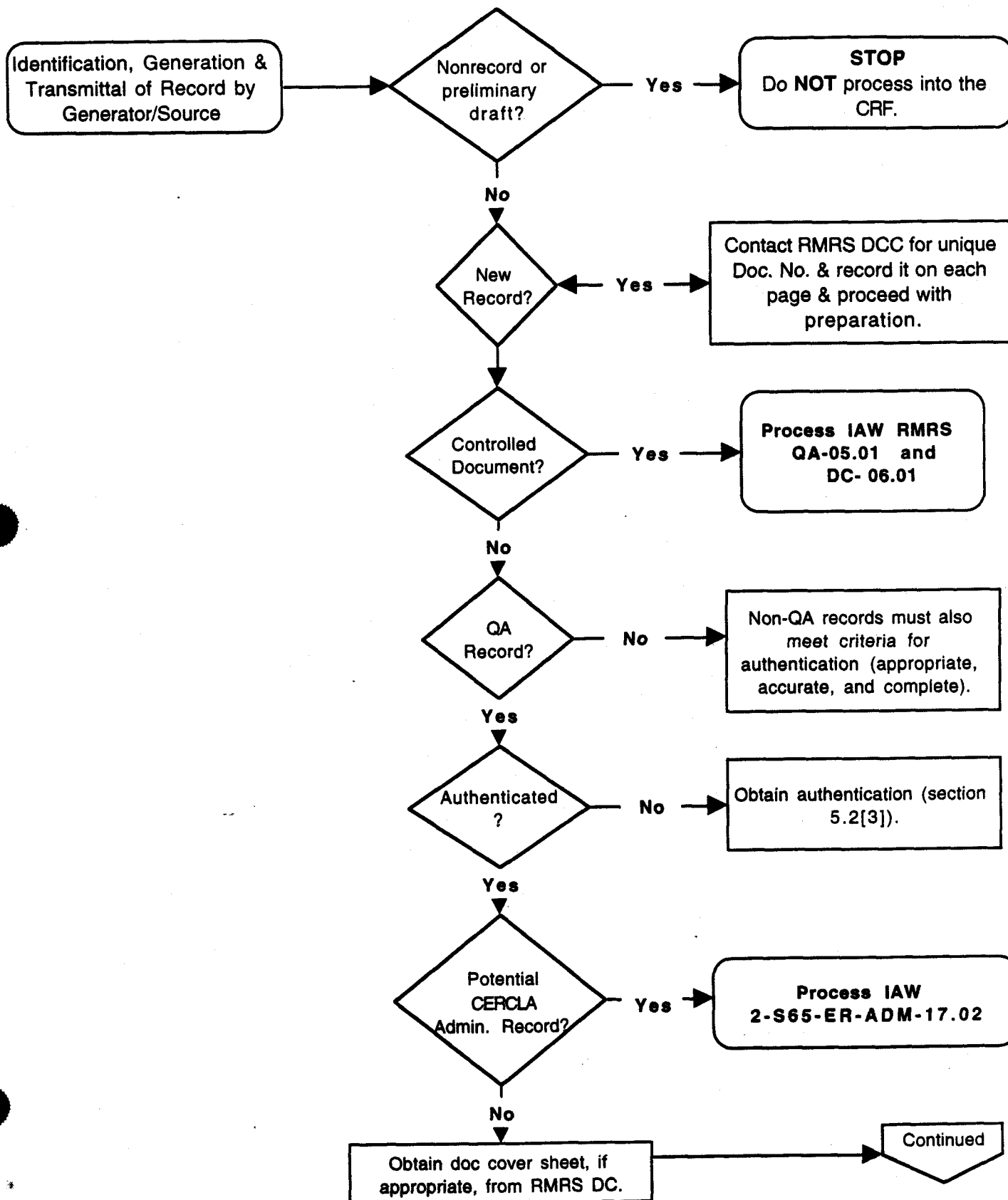
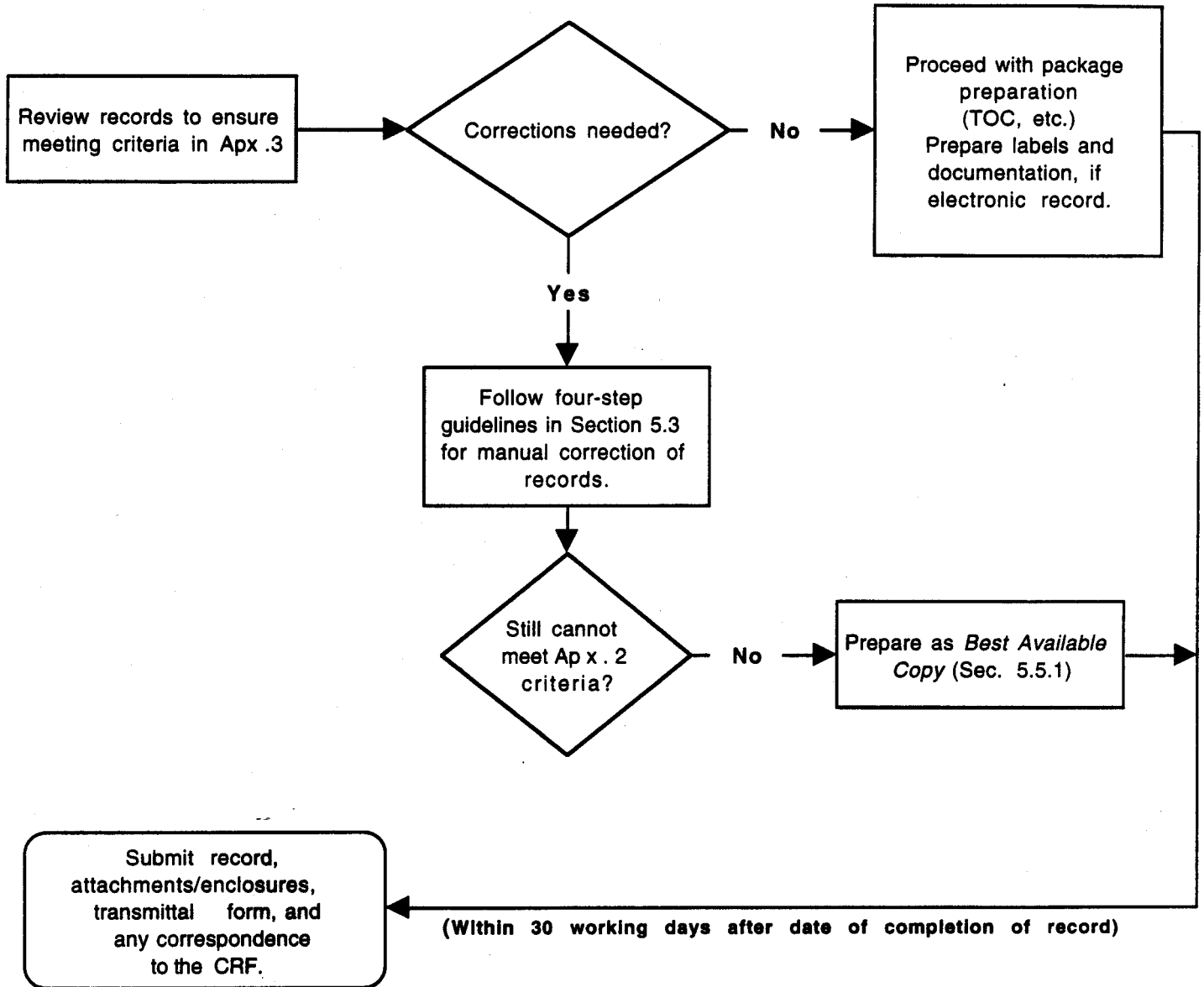


Figure 1
FLOW CHART (Continued)



- Has been prepared and maintained to demonstrate implementation of a QA program (e.g., audits, inspection reports, corrective action reports, procedures).
- Is a procurement contracting document (e.g., Statement of Work, Sole Source Justification).
- Implements administrative or operating procedures (e.g., training records, Health and Safety Plans, permit compliance reports, concurrence reports).

Records that do not meet the criteria of a QA record are considered non-QA records. Some examples of non-QA records are periodic reports, general correspondence, variance reports, and Five-Year Plans.

- (4) Determine whether a QA record is also a *controlled document*. A QA record identified as a *controlled document* is processed and transmitted in accordance with RMRS procedures QA-05.01, Preparation and Control of RMRS Documents, and DC-06.01, Document Control Program.

5.2 Generating a New Record

- (1) Contact the RMRS Document Control Center for a unique identification number and record it on each page of the document. Any attachments to a document shall carry the same unique identifier as the original document. Moreover, pagination is strongly recommended for documents of more than one page.
 - The correspondence control number on a letter serves as the unique identifier
- (2) If the record is a Request for Proposal or a contract, it must contain the stipulation that the subcontractor or vendor comply with RMRS record management requirements.
- (3) Authentication of both QA and non-QA records is required and is accomplished by one of the following methods:
 - Stamp, initial or sign, and date the document
 - Attach or add a written statement to the document
 - Issue a document that is clearly identified as a statement of authentication
 - Sign a Records Transmittal Form
- (4) Ensure records are legible, accurate, and complete.
 - All blanks on forms must be completed or marked "Not Applicable or NA," or cross out blank section(s) and initial
- (5) Ensure records display evidence of classification review
- (6) Do NOT:
 - Use self-adhesive labels on file folders, binders, or envelopes to be turned over with the records. (The Federal Records Center has advised that self-adhesive labels often fall off record containers due to uncontrolled climate conditions.)
 - Use non-reproducible highlighters, correction fluid or correction tape
 - Write special instructions or other notes, etc. in the margins of records

Note: Appendix 2, Quality Assurance Records Checklist, may be used to ensure records acceptance by the RMRS CRF. This checklist is considered non-record and is not included in the RMRS records system.

- (7) Obtain an RMRS document cover sheet, if appropriate, from RMRS Document Control Center prior to transmittal to the customer.

5.3 Correcting Records Prior to Submittal

- Draw a single line through the incorrect information, without obliterating the error
- Do NOT use correction fluid, erasures, or correction tape of any type to correct information on records
- Enter the correct information legibly and in close proximity to the text being changed
- Date and initial or sign the correction

5.4 Documenting Electronic Records

RMRS personnel creating electronic records should ensure that the records can be adequately read, retrieved, and duplicated until they are no longer needed. Instructions for retrieval and/or preservation must be documented in a manner to ensure long-term readability. This might include physical and technical characteristics of the records, hardware and software platforms required to read the records, a description of the form of the data, and any other technical information needed to read or process the records. If electronic records are received by an organization not involved in the creation of the system or the records, and if they are received with inadequate documentation, or require a hardware or software platform that is not available or is obsolete, the records are rendered useless. Electronic records should be turned over to the RMRS CRF with accompanying information to allow proper indexing and retrieval of the records. The records should have an external label affixed, or include documentation that contains the following:

- (1) Names or narrative description of the information submitted
- (2) Date(s) the information was generated
- (3) Name of person(s) or organization(s) that generated the information
- (4) Identifying number or codes, such as serial or volume number
- (5) Other supporting information as appropriate

Electronic records should be backed up on a regular basis to safeguard against the loss of information due to equipment malfunctions or human error. A duplicate copy should be maintained in the safe located in the RMRS CRF.

5.4.1 Electronic Mail (E-mail, cc:Mail)

The person who created, received, or acted upon a message/attachment that is a record is responsible for ensuring that it is printed and transmitted in hard copy form to the RMRS CRF. Non-records may be deleted without filing. The record must include transmission and receipt data as needed for adequate and proper documentation of agency activities as follows:

- Sender's name, date transmitted, names of recipients, and subject
- If a return receipt is requested, the verification of that receipt is also part of the record

Additional information on electronic records may be found in the Site Records Management procedure 1-V41-RM-001, Section 7.

5.5 Transmittal of Records and Record Packages to RMRS CRF

Note: Managers are responsible for ensuring that personnel within their organization have transmitted all completed records to the RMRS CRF prior to transfer or termination of employment.

Transmit completed individual records or records packages no later than 30 working days after date of completion or receipt by your department as follows:

- (1) Submit one copy of all incoming and outgoing correspondence or documents, except drawings (including attachments and enclosures), to the RMRS CRF by including the CRF on the courtesy copy (cc) list. Internal correspondence, memoranda and memos of telephone conversations are also transmitted in this manner.
 - QA records must meet the criteria identified in Appendix 2, or stamp or print "Best Available Copy"
- (2) Ensure that the following documentation, when applicable, accompanies the records:
 - Records Transmittal Form (Appendix 1)
 - Obtain the Records Transmittal Form from the RMRS CRF and complete it using the instructions on the back of the form
 - Records Package Table of Contents (forms are available from the RMRS CRF, if desired)
 - Documentation of Lost or Damaged Records (Section 5.8)
 - Documentation of Best Available Copy (Section 5.6.1)
 - Documentation of Authenticity (Section 5.2[3])

RMRS CRF personnel receive and process RMRS records in accordance with RM-06.03, *Records Receipt, Processing, and Retrieval*.

Note: Records maintained by RMRS organizations will be reviewed by the RMRS records organization and the Quality Assurance organization to determine the value of indexing and/or imaging for dual storage and retrieval. Priorities will be determined based on the risk of damage or loss of the records. Records no longer needed to conduct business will be turned over to the Site records organization by the Records Source in accordance with 1-V41-RM-001, and will not become part of the RMRS records system.

5.5.1 Submittal of Best Available Copy

If the record cannot meet all of the requirements described in these instructions or are of poor quality (i.e., wrinkled, torn, not legible), a *Best Available Copy* is transmitted to the RMRS CRF by performing the following:

- Submit a photocopy of the original when the original is written in pencil or has been torn or folded. Destroy the pencil version of the record to avoid unnecessary duplication of records.
- Provide a written explanation for those records or record packages that are technically incomplete, illegible and inadequate for their intended purpose, or cannot be replaced or regenerated.
- List those records or record packages individually on a Records Transmittal Form and indicate as *Best Available Copy* of that record.
- Stamp or print *Best Available Copy* on the record.

5.5.2 Supporting Documentation

If supporting materials were generated in the process of preparing a report, study, or other record, or were otherwise generated during any other activity now completed, and are to be submitted along with the record, ensure that:

- All supporting materials are clearly identified on the Records Transmittal Form as *supporting* or *backup* material. (Supporting or backup materials do not have to contain the document identification number of the record.)
- The supporting materials are submitted as part of the record package.

5.5.3 One-of-a-Kind and Special Processed Records

- Duplicate all special processed records that can be generated in duplicate (such as magnetic tapes and negatives), and submit the original and duplicate to the RMRS CRF.
 - If the cost or difficulty in generating duplicates is prohibitive, identify those records on the Records Transmittal Form, and submit a single copy to the RMRS CRF.

5.6 Corrections to Previously Processed Records and Record Packages

- (1) Notify the RMRS CRF immediately of any errors in previously processed records or record packages.
- (2) If new information is added to a record previously submitted to the RMRS CRF, follow the instructions for preparation and transmittal of a new record.

The original records or record packages remain in the system, but the database states that the new records or parts of a record package supersede the old records or parts of a record package.

5.7 Lost or Damaged Records

- (1) Notify the RMRS CRF in writing.
- (2) Replace or repair the lost or damaged records when possible.
 - Recreate or replace the information using duplicate files from back-up or dual storage.
 - Reconstruct the record based on the originator's personal inspection notes.
 - Determine the existence of other records which would substantiate the needed information.

If restoration or replacement of such records is not possible, document that fact in writing and transmit it to the RMRS CRF.

6.0 RECORDS

The following records generated during the performance of this procedure must be controlled as follows:

<u>Document</u>	<u>Record Type</u>	<u>Disposition</u>
Completed Records Transmittal Form	QA, Non- Permanent	Maintain in RMRS CRF two years; then destroy.
Records Package Table of Contents	QA - CERCLA AR	Retained with records package and dispositioned in accordance with retention identified for package type. ARs are retained by the RMRS CRF for one year following a Record of Decision. Then formally transmit to the Department of Energy Rocky Flats Field Office for storage.
Documentation of Lost or Damaged Record	QA	Disposition by original record type.
Documentation of Best Available Copy	QA	Retain and disposition with original record.
Documentation of Authenticity	QA	Retain and disposition with original record.

7.0 REFERENCES

- 7.1 10 CFR 830.120, Price Anderson Act
- 7.2 DOE Order 5700.6C, Quality Assurance
- 7.3 1-V41-RM-001, Records Management Guidance for Records Sources
- 7.4 RMRS-QAPD-001, RMRS Quality Assurance Program Description
- 7.5 Section 113(k)(1), Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- 7.6 DOE Order 1324.5B, Records Management Program
- 7.7 DC-06.03, Records Receipt, Processing, and Retrieval
- 7.8 QA-05.01, Preparation and Control of RMRS Documents
- 7.9 2-S65-ER-ADM-17.02, Administrative Record Document Identification and Transmittal
- 7.10 DC-06.01, Document Control Program

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Note: The RMRS CRF is located in building 116, telephone number (303)966-5472. These changes will be made with the next printing.

Appendix 1 (Continued)
Records Transmittal Form Instructions

Entry Number

Directions

- 1 The name of the RMRS or Subcontractor employee who originated the document.
- 2 The name of the Subcontractor organization or the RMRS Department and Group.
- 3 Records Source telephone number.
- 4 Subcontract number (if applicable) .
- 5 The responsible RMRS manager who authenticates subcontractor submitted documents prior to their transmission to the RMRS Records Center.
- 6 Responsible RMRS Authority's organization code.
- 7 Responsible RMRS Authority's telephone number.
- 8 Title/Subject. (Additional keywords or phrases should be added after the title/subject to aid in retrieval of the information.)
- 9 The unique document identification number assigned to that document.
- 10 Records categories to be completed by the responsible RMRS Authority
QA = Quality Assurance Record
N = Nonquality Record
AR = CERCLA Administrative Record
- 11 The total number of pages in the document (double-sided pages should be considered 2 pages).
- 12 The date the record is completed or approved.
- 13 The applicable Operable Unit IHSS Number or Building Number.
- 14 The date the transmittal form was forwarded to the RMRS Records Center.
- 15 The signature of the person who prepared the transmittal.
- 16 The signature of the person who originated the documents. Signature on this line releases the document to the RMRS Records Center.
- 17 The signature of the Project File Center employee who receives the records for processing.

NOTE: The Records Source should make a copy of the Records Transmittal form prior to transmitting it to the RMRS Records Center. When the Center accepts the records listed on the form, an acknowledgement copy of the completed form will be transmitted to the Records Source.

Appendix 2

QUALITY ASSURANCE RECORDS CHECKLIST				
Item	Criteria	Meets Criteria		Remarks
1	Legible and relevant data is contained within the record/data package. The data is reproducible.	Yes	No	
2	When a record is poor quality (not legible, torn, etc.) but is the ONLY copy, BEST AVAILABLE COPY must be written or stamped on the deficient page or first page of the record, and initial and date.	Yes	No	
3	The record is complete and contains detail as to the records purpose scope, method, etc.	Yes	No	
4	The record identifies container numbers, drum numbers, and/or the activity (i.e., GCMS, MS, ICP, OU/IHSS) involved.	Yes	No	
5	The record contains a unique identifier, and any attachments carry the same unique identifier as the original document. (Document identification numbers are obtained from RMRS Document Control X5430.)	Yes	No	
6	Indelible ink (preferably black) has been used to sign, date, and enter data on records. (Convert records written in pencil to an indelible medium such as photocopies and destroy the pencil version.)	Yes	No	
7	Record is authenticated by authorized personnel by: initialing or signing, and dating; attaching a written, signed, and dated statement; attaching a statement by a reporting organization (such as a signed cover page).	Yes	No	
8	The record is free of nonreproducible highlighters, correction fluid, correction tape and marginalia. (Some records will contain other acceptable markings such as redline/red stamping for inspection or acceptance status indicators.	Yes	No	
9	Records over one page should be paginated, and all pages are present.	Yes	No	
10	Errors made in a record have a single line through the error; the correction made above the error and the initial and date of the individual making the correction is placed next to the correction.	Yes	No	
11	All blocks on forms are completed with appropriate data, marked "NA" (not applicable), or blank sections are crossed through and initialed.	Yes	No	
12	RMRS Records Transmittal Form, or equivalent, has been completed to forward record or record package to RMRS CRF.	Yes	No	
13	Records have been reviewed for classification, stamped and initialed accordingly.	Yes	No	

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ADMINISTRATIVE PROCEDURES

Effective Date: 5/28/97

Organization: RMRS

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06	DC-06.01 Document Control Program	0	02/17/97
	RM-06.02 Records Identification, Generation and Transmittal	0	05/28/97
	RM-06.03 Records Receipt ,Processing, Retrieval, and Disposition	0	05/28/97
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